

**REMARKS**

Claims 1-26 are pending in this application. By this Amendment, claims 2, 5, 7, 9-12, 16-19 and 23 are amended and new claim 25 is added. Various amendments are made to the claims for clarity and are unrelated to issues of patentability. For example, the amendments to claims 2, 5, 7 and 23 are merely for clarity.

The Office Action rejects claims 5-23 and 25 under 35 U.S.C. §103(a) over U.S. Patent 6,081,525 to Christie. The Office Action also rejects claims 1-4 and 24 under 35 U.S.C. §103(a) over Christie in view of U.S. Patent 5,138,614 to Baumgartner et al. (hereafter Baumgartner). The rejections are respectfully traversed with respect to the pending claims.

Independent claim 5 recites various features such as a primitive managing unit for determining whether a received message is an N-ISUP message type or a B-ISUP message type, and a message distribution managing unit transmitting an originating N-ISUP message from the primitive managing unit through the activated N-ISUP network to an ISDN user part based on the determined message type and the message distribution managing unit transmitting an originating B-ISUP message from the primitive managing unit through the activated B-ISUP network to the ISDN user part based on the determined message type.

In addressing independent claim 5, the Office Action (on pages 2-3) states that Christie does not specifically disclose the claimed primitive managing unit and message distribution managing unit. The Office Action cites Christie's col. 11, lines 16-32 and col. 13, lines 33-60 as disclosing that the MTP unit may have both N-ISUP and B-ISUP capability. Applicant

respectfully disagrees with this statement as Christie does not state that the MTP unit may have both N-ISUP and B-ISUP capabilities.

Christie specifically discloses that the signaling protocols are based on N-ISUP. See col. 6, lines 40-43 and col. 11, lines 16-22. In other words, Christie specifically relates to N-ISUP signaling. Christie does disclose that an alternative type of signaling may be used. For example, col. 13, lines 3-7 discloses that B-ISUP signaling may also be used. This is the only reference to B-ISUP. No further details are provided for B-ISUP signaling. There is no suggestion in Christie that both N-ISUP and B-ISUP capability may be provided at a same time. Rather, the citation at col. 13, lines 3-6, which is relied upon in the Office Action, is merely an indication that an alternative arrangement may be provided. However, this arrangement is not described in Christie. Applicant further submits that there is no suggestion that an MTP unit may have both N-ISUP and B-ISUP capability as asserted in the Office Action on page 3, lines 5-6. Therefore, the Office Action can not make assumptions regarding both N-ISUP and B-ISUP capabilities. The reference does not suggest such features.

Absent any suggestion in the prior art, there is no motivation to modify Christie so as to include the claimed primitive managing unit and the claimed message distribution managing unit. That is, applicant respectfully disagrees with the Office Action's statement that it would be obvious to have the system of Christie determine whether the message is a N-ISUP or a B-ISUP and route it to the appropriate network. Christie does not suggest this statement. None of the applied references teach or suggest the claimed primitive managing unit and claimed message

distribution managing unit as recited in independent claim 5. Accordingly, in absence of some references showing these features, independent claim 5 defines patentable subject matter.

Additionally, independent claim 5 recites various units that relate to both the N-ISUP network and the B-ISUP network. As stated above, applicant respectfully submits that Christie does not disclose N-ISUP and B-ISU capability simultaneously. However, even if such capability were suggested in Christie, then Christie still would not teach or suggest the respective units in claim 5 relating to both the N-ISUP and B-ISUP networks. That is, there is no suggestion for each of the specifically claimed units. Thus, independent claim 5 defines patentable subject matter at least for this additional reason.

Independent claim 7 recites determining that a received message is a N-ISUP message type based on a code within the received message and determining that another received message is a B-ISUP message type based on the code within the another received message. Independent claim 7 also recites transmitting a N-ISUP message through the activated N-ISUP network to the ISDN user part based on the determined message type, and transmitting a B-ISUP message through the activated B-ISUP network to the ISDN user part based on the determined message type. For at least similar reasons as set forth above, Christie does not teach or suggest these features. Thus, independent claim 7 defines patentable subject matter.

Still further, independent claim 14 recites determining that a received message is a N-ISUP message type based on a code within the received message and determining that another received message is a B-ISUP message type based on the code within the another received message. Independent claim 14 further recites transmitting a corresponding message through the

Reply to Office Action dated December 15, 2005

activated N-ISUP network to the ISDN user part based on the determined message type and transmitting another corresponding message through the activated B-ISUP network to the ISDN user part based on the determined message type. For at least similar reasons as set forth above, Christie does not teach or suggest these features. Thus, independent claim 14 defines patentable subject matter.

Independent claim 1 recites a MTP level 3 protocol integrating unit receiving a predetermined message from a lower layer of protocol and determining whether the message is a N-ISUP message type or is a B-ISUP message type based on a code within the received message, the MTP level 3 protocol integrating unit simultaneously interfacing the corresponding message to either the N-ISUP network or the B-ISUP network according to the determined message type of the predetermined message, wherein the MTP level 3 protocol integrating unit is capable of interfacing an N-ISUP message to the N-ISUP network and interfacing a B-ISUP message to the B-ISUP network.

The Office Action (on page 8) asserts that Christie does not specifically disclose determining whether the message is a B-ISUP message type and interfacing the B-ISUP message to the B-ISUP network. The Office Action then asserts that it would have been known to have B-ISUP capability in an MTP module in addition to N-ISUP capability. The Office Action cites Christie's column 13, lines 3-6. However, for at least similar reasons as set forth above, Christie does not teach or suggest the features alleged in the Office Action.

Additionally, the Office Action (on page 9) asserts that Christie does not disclose the networks being interfaced simultaneously. The Office Action then relies on Baumgartner's

Figure 3 and col. 4, lines 33-35 as disclosing a multicasting operation simultaneously sending out messages to different networks. However, applicant respectfully submits that Baumgartner does not teach or suggest multicasting operations to a B-ISUP network and an N-ISUP network. Christie does not teach or suggest these features. In other words, neither of the applied references relate to an MTP level 3 protocol integrating unit simultaneously interfacing the corresponding message to either the N-ISUP network or the B-ISUP network. Further, neither of the applied references relate to the MTP level 3 protocol integrating unit being capable of interfacing an N-ISUP message to the N-ISUP network and interfacing a B-ISUP message to the B-ISUP network. Accordingly, independent claim 1 defines patentable subject matter.

For at least the reasons set forth above, each of independent claims 1, 5, 7 and 14 defines patentable subject matter. Each of the dependent claims depends from one of the independent claims and therefore defines patentable subject matter at least for this reason. In addition, the dependent claims recite features that further and independently distinguish over the applied references.

For example, dependent claim 26 recites the protocol integrating apparatus simultaneously interfaces the N-ISUP network and the B-ISUP network. For at least similar reasons as set forth above, Christie and Baumgartner do not teach or suggest these features. Thus, dependent claim 26 defines patentable subject matter at least for this additional reason.

Additionally, dependent claim 2 recites various units that relate to both the N-ISUP network and the B-ISUP network. Christie does not teach or suggest these features for at least the reasons set forth above. Even further, even if Christie did disclose N-ISUP and B-ISUP

Serial No. **09/893,459**

Docket No. **P-0229**

Reply to Office Action dated December 15, 2005

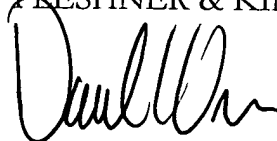
network capability at the same time, this still would not suggest the specific units recited in dependent claim 2. Thus, dependent claim 2 defines patentable subject matter at least for this additional reason.

### **CONCLUSION**

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Favorable consideration and prompt allowance of claims 1-26 are earnestly solicited. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,  
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